

FILED

AUG 25 2021

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

MERCEDES PRIMUS,

Defendant.

4:21CR482 SRC/NAB

INDICTMENT

The Grand Jury charges:

COUNT 1

IDENTITY THEFT: 18 U.S.C. § 1028I

INTRODUCTION

1. The State of Missouri permits the transfer of property from one owner to another through a quit claim deed. This enables the current owner to provide title without providing a warranty of title.

2. When property located in the City of St. Louis, Missouri is to be transferred through a warranty deed, the grantor, the current owner of the property, and the grantee, the future owner of the property, must sign the warranty deed, and their signatures must be authenticated by a licensed notary public.

3. On or about July 20, 2020, defendant, **MERCEDES PRIMUS**, used a warranty deed that falsely authenticated through use of the signature and notary seal of

D.Y. to transfer property located in the City of St. Louis to herself from V.H. At the time of the transfer to defendant, **MERCEDES PRIMUS**, from V.H. V.H. was dead.

4. V.H. did not sign the warranty deed used to transfer property located in the City of St. Louis to defendant, **MERCEDES PRIMUS**.

5. After accepting the fraudulently obtained warranty deed as legitimate, representatives of the City of St. Louis, Missouri recorded defendant, **MERCEDES PRIMUS**, as the owner of the residence located at 4514 Harris Avenue, St. Louis, Missouri.

THE OFFENSE CONDUCT

On or about July 20, 2020, within the Eastern District of Missouri, the defendant,

MERCEDES PRIMUS,

in a matter affecting interstate commerce, knowingly transferred, possessed, and used, without lawful authority, the means of identification of another, that being the name and notary identification number of D.Y., with the intent to commit, and in connection to the felony crimes of forgery, in violation of Missouri Revised Statutes §570.090, and stealing, in violation of Missouri Revised Statutes §570.030, to fraudulently transfer the property located at 4514 Harris Avenue, St. Louis, Missouri.

In violation of Title 18, United States Code, Section 1028(a)(7) and punishable under Title 18, United States Code, Section 1028(b)(2)(B).

COUNT 2

[IDENTITY THEFT: 18 U.S.C. § 1028]

The Grand Jury further charges that:

On or about July 20, 2020, within the Eastern District of Missouri, the defendant,

MERCEDES PRIMUS,

in a matter affecting interstate commerce, knowingly transferred, possessed, and used, without lawful authority, the means of identification of another, that being the name of V.H., the property owners, with the intent to commit, and in connection to the felony crimes of forgery, in violation of Missouri Revised Statutes §570.090, and stealing, in violation of Missouri Revised Statutes §570.030.

In violation of Title 18, United States Code, Section 1028(a)(7) and punishable under Title 18, United States Code, Section 1028(b)(2)(B).

A TRUE BILL

FOREPERSON

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